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May 31, 2022

**VIA ECF**

Magistrate Judge Lois Bloom  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Renewed motion for setting of initial conference.**

*Texidor v. Tromberg, Morris & Poulin, PLLC, et al.*, No. 1:21-cv-04845-RPK-LB

Dear Judge Bloom:

The undersigned represents the Plaintiff Luz Texidor in this lawsuit against Defendants Tromberg, Morris & Poulin, PLLC f/k/a Stephen Einstein & Associates, P.C. (“Tromberg”), Stephen Einstein (collectively with Tromberg, “Tromberg Defendants”), Collins Financial Services, Inc. (“CFS”), ABC Process Serving Bureau, Inc. d/b/a ABC Process Service (“ABC”), Jay Brodsky (collectively with ABC “ABC Defendants”) and Azzam Abderrahman for violations of the FDCPA and related state law.

The procedural history of this action is as follows. On August 27, 2022 Plaintiff filed her Original Complaint. Dkt. No. 1. Defendants were served with the Summons and Complaint in October and November. Tromberg Defendants filed a request for an extension of their time to answer on November 3, 2021. Dkt. No. 23. And then Tromberg Defendants filed their Answer on November 9, 2021. Dkt. No. 24. Default was entered against Defendant ABC on November 16, 2021. Dkt. No. 28. Defaults were entered against Defendants CFS and Mr. Abderrahman on January 11, 2022. Dkt. Nos. 31-32. On January 31, 2022 Defendant ABC filed, on consent, a motion to vacate the default entered against it and to file a responsive pleading by February 28, 2022. Dkt. No. 35. On February 18, 2022 Judge Kovner referred that consent application to Your Honor.

On March 17, 2022, Your Honor ordered that the March 31, 2022 initial conference be adjourned *sine die* in light of Plaintiff’s forthcoming First Amended Complaint. On April 22, 2022, Plaintiff filed her First Amended Complaint. Dkt. No. 43. Tromberg Defendants filed their Answer to the FAC on May 12, 2022. Dkt. No. 45. Per Judge Kovner’s May 27, 2022 Order, ABC Defendants will be filing a Motion to Dismiss in response to the FAC.

As such, it is time to proceed with discovery in this matter, and thus Plaintiff respectfully requests an Order (1) setting an initial conference in this matter before Your Honor and (2) for the parties to comply with ¶ 4 of Your Honor’s Individual Practice Rules, including the submission of a joint report to the Court by ECF at least 7 days prior to the initial conference.

Respectfully,

/s/

Ahmad Keshavarz, Esq.